

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FRONTPONT ASIAN EVENT DRIVEN FUND, L.P.,
and SONTERRA CAPITAL MASTER FUND, LTD., on
behalf of themselves and all others similarly situated,

Plaintiffs,

- against -

CITIBANK, N.A., CITIGROUP INC., BANK OF AMERICA CORPORATION, BANK OF AMERICA, N.A., JPMORGAN CHASE & CO., JPMORGAN CHASE BANK, N.A., THE ROYAL BANK OF SCOTLAND PLC, THE ROYAL BANK OF SCOTLAND GROUP PLC, RBS SECURITIES JAPAN LIMITED, UBS AG, UBS SECURITIES JAPAN CO. LTD., ING GROEP N.V., ING BANK N.V., ING CAPITAL MARKETS LLC, BNP PARIBAS, S.A., BNP PARIBAS NORTH AMERICA, INC., BNP PARIBAS SECURITIES CORP., BNP PARIBAS PRIME BROKERAGE, INC., OVERSEA-CHINESE BANKING CORPORATION LTD., BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., DEUTSCHE BANK AG, CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK, CREDIT AGRICOLE S.A., CREDIT SUISSE GROUP AG, CREDIT SUISSE AG, CREDIT SUISSE INTERNATIONAL, STANDARD CHARTERED BANK, STANDARD CHARTERED PLC, DBS BANK LTD., DBS GROUP HOLDINGS LTD, DBS VICKERS SECURITIES (USA) INC., UNITED OVERSEAS BANK LIMITED, UOB GLOBAL CAPITAL, LLC, AUSTRALIA AND NEW ZEALAND BANKING GROUP, LTD., ANZ SECURITIES, INC., THE BANK OF TOKYO-MITSUBISHI UFJ, LTD., THE HONGKONG AND SHANGHAI BANKING CORPORATION LIMITED, HSBC BANK USA, N.A., HSBC HOLDINGS PLC, HSBC NORTH AMERICA HOLDINGS INC., HSBC USA INC., MACQUARIE BANK LTD., MACQUARIE GROUP LTD., COMMERZBANK AG, AND JOHN DOES NOS. 1-50,

Defendants.

Docket No. 16-cv-05263-AKH

**NOTICE OF DEFENDANTS'
MOTIONS TO DISMISS THE
CORRECTED SECOND
AMENDED CLASS
ACTION COMPLAINT**

**ORAL ARGUMENT
REQUESTED**

PLEASE TAKE NOTICE that the undersigned, attorneys for Defendants Citibank, N.A., Citigroup Inc., Bank of America Corporation, Bank of America, N.A., JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., The Royal Bank of Scotland plc, The Royal Bank of Scotland Group, plc, RBS Securities Japan Limited, UBS AG, UBS Securities Japan Co. Ltd., ING Groep N.V., ING Bank N.V., ING Capital Markets LLC, BNP Paribas, S.A., BNP Paribas North America, Inc., BNP Paribas Securities Corp., BNP Paribas Prime Brokerage, Inc., Oversea-Chinese Banking Corporation Limited, Barclays PLC, Barclays Bank PLC, Barclays Capital Inc., Deutsche Bank AG, Crédit Agricole Corporate and Investment Bank, Crédit Agricole S.A., Credit Suisse Group AG, Credit Suisse AG, Credit Suisse International, Standard Chartered Bank, Standard Chartered PLC, DBS Bank Ltd., DBS Group Holdings Ltd, DBS Vickers Securities (USA) Inc., United Overseas Bank Limited, UOB Global Capital, LLC, Australia and New Zealand Banking Group, Ltd., ANZ Securities, Inc., The Bank of Tokyo-Mitsubishi UFJ, Ltd., The Hongkong and Shanghai Banking Corporation Limited, HSBC Bank USA, N.A., HSBC Holdings plc, HSBC North America Holdings Inc., HSBC USA Inc., Macquarie Bank Ltd., Macquarie Group Ltd., and Commerzbank AG, in the above-referenced matter, request oral argument and will move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York, at a date and time to be determined by this Court, for an order pursuant to Rules 12(b)(1), 12(b)(2), 12(b)(3), and 12(b)(6) of the Federal Rules of Civil Procedure dismissing with prejudice, in whole or in part, the claims asserted in the Corrected Second Amended Class Action Complaint.

The grounds for these motions are that the Corrected Second Amended Complaint should be dismissed for lack of personal jurisdiction as to certain Defendants,¹ for lack of venue as to certain Defendants,² for lack of subject matter jurisdiction, and for failure to state a claim upon which relief can be granted as to all Defendants. The specific grounds for Defendants' motions to dismiss are set forth in the following accompanying papers: (1) the Joint Memorandum of Law in Support of Defendants' Motion to Dismiss the Corrected Second Amended Class Action Complaint for Lack of Subject Matter Jurisdiction and Failure to State a Claim, the accompanying Declaration of Matthew J. Porpora, dated October 18, 2017, and exhibits thereto, and the accompanying Declaration of Joel Kurtzberg Regarding Foreign Law, and exhibits thereto; and (2) the Joint Memorandum of Law in Support of Foreign Defendants' Motion to Dismiss All Claims for Lack of Personal Jurisdiction and Venue, and exhibits thereto, and the accompanying Declaration of Joel Kurtzberg in Support of Foreign Defendants' Motion to Dismiss All Claims for Lack of Personal Jurisdiction and Venue, dated October 18, 2017, and exhibits thereto.

¹ Those Defendants are: The Royal Bank of Scotland plc; The Royal Bank of Scotland Group plc; RBS Securities Japan Limited; UBS AG, UBS Securities Japan Co. Ltd.; ING Groep N.V.; ING Bank N.V.; BNP Paribas, S.A.; Oversea-Chinese Banking Corporation Ltd.; Barclays PLC; Barclays Bank PLC; Deutsche Bank AG; Crédit Agricole Corporate and Investment Bank; Crédit Agricole S.A.; Credit Suisse Group AG; Credit Suisse AG; Credit Suisse International; Standard Chartered Bank; Standard Chartered PLC; DBS Bank Ltd.; DBS Group Holdings Ltd; United Overseas Bank Limited; Australia and New Zealand Banking Group, Ltd.; The Bank of Tokyo-Mitsubishi UFJ, Ltd.; The Hongkong and Shanghai Banking Corporation Limited; HSBC Holdings plc; Macquarie Bank Ltd.; Macquarie Group Ltd.; and Commerzbank AG.

² Those Defendants are: Barclays PLC; Crédit Agricole S.A.; Credit Suisse Group AG; Credit Suisse International; DBS Group Holdings; The Hongkong and Shanghai Banking Corporation Limited; HSBC Holdings plc; ING Groep N.V.; ING Bank, N.V.; The Royal Bank of Scotland plc; The Royal Bank of Scotland Group plc; RBS Securities Japan Limited; Standard Chartered PLC; UBS Securities Japan Co. Ltd.; and Macquarie Group Ltd.

Dated: October 18, 2017
New York, New York

Respectfully submitted,

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*Sonterra Capital Master Fund, Ltd. Notice of Winding Up
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- Joint Memorandum of Law in Support of Defendants' Motion to Dismiss the Corrected Second Amended Class Action Complaint for Failure to State a Claim
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<i>Primer on Interest Rates</i> , Credit Suisse (Apr. 28, 2010).....	FF
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<i>RBS Managers Condoned LIBOR Manipulation During Expansion</i> , Bloomberg News (Sept. 25, 2012)	II
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